## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ALEXANDER NORRIS,

:

Plaintiffs,

v. : Civil Action No. 1:19-CV-05491 - PAE

:

Marc Goldner, Individually and as Officer of : GOLDEN BELL ENTERTAINMENT, LLC, a : California company and GOLDEN BELL : STUDIOS, LLC, a California Company, :

:

Defendants,

:

:

AFFIDAVIT OF RYAN DOLAN, ESQ.

I, Ryan Dolan, Esq., declare as follows:

1. I am over the age of eighteen and an Associate at Gerard Fox Law, PC, attorneys

of record for Defendants in the above referenced case. I make this declaration in in response to

the Court's Order included in Dkt. No. 98 of the above referenced matter. I have personal

knowledge of the matters stated herein and, if called upon, I could and would competently testify

thereto.

2. I make this declaration in response to the Court's Order to Show Cause regarding

materials received from Plaintiff on July 13, 2022. We have counseled Defendants to delete all

files and materials received on July 13, 2022, any copies thereof, and any derivative work created

from those files.

3. To the best of my knowledge, Defendants have deleted the files and materials as

indicated in the Deposition of Marc Goldner, submitted contemporaneously herewith.

I declare under penalty of perjury that the foregoing is true and correct. Executed this

18<sup>th</sup> day of August 2022 at New York, New York.

/s/ Ryan Dolan

Ryan Dolan, Esq.